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February 27, 2024

VIA ECF

Hon. James M. Wicks, Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: *Bullion Exchange LLC v. Bullion Shark LLC and Ekaterina Ovodova*
Case No.: 2:24-cv-00467-DG-JMW
Letter Motion for Leave to Exceed Page Limit

Dear Judge Wicks:

As you may know, this firm represents Plaintiff Bullion Exchange LLC (“Plaintiff”) in the above-referenced case. I respectfully submit this letter-motion seeking leave to exceed the standard word limit for the Memorandum of Law in Support of Plaintiff’s Motion for leave to file its Second Amended Complaint (“SAC”).

Pursuant to Your Honor’s Individual Practice Rules, memoranda of law in support of motions on notice are limited to 6,500 words. However, due to the complexity of the nine (9) claims asserted against Defendants and the detailed factual allegations supporting them, additional words are necessary to provide the Court with a full and clear analysis of the relevant legal and factual issues. For added context, the SAC, which the Motion seeks leave to file and which the Memorandum of Law defends, is 47 pages and exceeds 12,000 words. Given the volume of allegations and legal claims addressed, and in spite of Plaintiff’s best efforts to be concise, an expansion is necessary to adequately support Plaintiff’s position.

Consequently, Plaintiff respectfully requests leave to submit a memorandum not exceeding 8,500 words.

Plaintiff appreciates the Court’s time and attention to this matter.

Respectfully submitted,

_____/s/____

Eugene Bondar

Attorney for Plaintiff Bullion Exchange LLC

cc: All counsel of record (via ECF)